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5 Attorneys for National General Assurance
6 Company

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 NATIONAL GENERAL ASSURANCE
11 COMPANY,

12 Plaintiff,

13 vs.

14 DWAIN ROCKWOOD TURNER, an
individual; DOES I-V,

15 Defendants.
16

CASE NO. 2:19-cv-01713

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE OPPOSITION
AND REPLY TO MOTIONS FOR
SUMMARY JUDGMENT
(First Request)**

17 Intervenor, Helal Sekder ("Sekder"), filed a Motion for Summary Judgment Regarding
18 Coverage on 1/10/20. Plaintiff, National General Assurance Company ("NGAC") filed an
19 Opposition to Sekder's MSJ on 1/30/20. Additionally, NGAC filed a Counter-Motion for
20 Summary Judgment Regarding Coverage on 1/31/20.

21 Currently, Sekder's Reply in Support of his Motion for Summary Judgment is due on
22 February 13, 2020. Sekder's Opposition to NGAC's Counter-Motion for Summary Judgment is
23 due on February 21, 2020.

24 IT IS HEREBY STIPULATED between the parties to the above-entitled action, by and
25 through their undersigned counsel of record, that the time for Sekder to file the above-referenced
26 reply and opposition may be extended for 30 days, to March 13, 2020 and March 23, 2020,
27 respectively.

28 This is the first request for an extension of time to respond to the above-referenced

1 motions. The parties respectfully submit that good cause exists for the extension because: (1)
2 Sekder recently made a settlement demand to NGAC and its insured, Dwaine Rockwood Turner,
3 which NGAC would like sufficient time to review and consider; and (2) NGAC is in the process
4 of substituting new counsel into the case, Lewis Brisbois Bisgaard & Smith, LLP, in place of its
5 current counsel, Winner & Sherrod. NGAC's new counsel will need time to evaluate the case and
6 advise NGAC regarding Sekder's settlement demand. The settlement demand, if accepted, would
7 resolve and render moot the pending Motions for Summary Judgment. The requested extension is
8 being sought to avoid the time and expense that will be incurred to finish briefing the pending
9 motions while the parties explore settlement potential.

10 DATED this 12th day of February, 2020.

DATED this 12th day of February, 2020.

11 /s/ Jesse M. Sbaih

/s/ Alice K. Herbolsheimer


12 By: _____
13 Jesse M. Sbaih, Esq.
14 JESSE SBAIH & ASSOCIATES, LTD.
15 The District at Green Valley Ranch
16 170 South Green Valley Parkway, Suite 280
17 Henderson, NV 89012

By: _____
Alice K. Herbolsheimer, Esq.
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SMITH LLP
5555 Kietzke Lane, Suite 200
Reno, Nevada 89511

18 *Attorneys for Intervenor, Helal Sekder*

Attorneys for Plaintiff, NGAC

19 IT IS SO ORDERED.

20 
21 _____
22 RICHARD F. BOULWARE, II
23 UNITED STATES DISTRICT JUDGE

24 DATED this 12th day of February, 2020.

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CERTIFICATE OF SERVICE

Pursuant to FRCP Rule 5(b), I certify that I am an employee of LEWIS BRISBOIS BISGAARD & SMITH LLP and that on this 12th day of February, 2020, I caused a true and correct copy of **STIPULATION AND ORDER TO EXTEND TIME TO FILE OPPOSITION AND REPLY TO MOTIONS FOR SUMMARY JUDGMENT** to be served via the court's electronic system to the following:

Jesse M. Sbaih, Esq.
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Thomas E. Winner, Esq.
Steven C. Devney, Esq.
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By /s/ Sherie Morrill
An Employee of
LEWIS BRISBOIS BISGAARD & SMITH LLP